

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA, et al., *ex*
rel. WJFE LLC.,

Plaintiff,

v.

FERRING PHARMACEUTICALS, INC.
and FERRING INTERNATIONAL
PHARMASCIENCE CENTER, U.S., INC.,

Defendants.

Civil Case No. 3:12-CV-00542

Judge Sharp
Magistrate Judge Knowles

STIPULATION OF DISMISSAL WITH PREJUDICE

The present action was filed under the qui tam provisions of the False Claims Act, 31 U.S.C. § 3729 *et seq.*, by Relator WJFE LLC (“Relator”) against Ferring Pharmaceuticals, Inc. and Ferring International PharmaScience Center, U.S., Inc.. (“Defendants”) (collectively, the “Parties”). Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and the qui tam provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), the Parties hereby stipulate, through their undersigned counsel, to the entry of an order dismissing with prejudice all claims asserted by Relator on behalf of itself, its members, the United States and the Plaintiff States against the Defendants in this action; provided, however, that dismissal with respect to the United States and the Plaintiff States shall be without prejudice. The United States and Plaintiff States, which elected not to intervene in this action, have represented to the Parties that they consent to the dismissal of this action with prejudice as to the Relator and its members, and without prejudice as to the United States and the Plaintiff States. The Parties request that, pursuant to 31 U.S.C. § 3730(b)(1), the Court permit time for the United States and the Plaintiff States to file their written consent to dismissal.

The Parties respectfully request that, after the United States and Plaintiff States file their written consent to the dismissal, the Court enter an order in the form of the proposed order being submitted to today.

September 4, 2014

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served upon opposing counsel, via the Court's CM/ECF e-mail notification system, on this the 4th day of September, 2014:

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